

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. __

**ORDER SUSTAINING DEBTORS' FOURTH
OMNIBUS OBJECTION TO CERTAIN CLAIMS (NON-SUBSTANTIVE)
(Duplicate Claims& Amended Claims)**

Upon consideration of the *Debtors' Fourth Omnibus Objection to Certain Claims (Non-Substantive)* (the "Objection");² and upon consideration of the Haughey Declaration; and the United States District Court for the District of Delaware having jurisdiction to consider this Objection under 28 U.S.C. § 1334, which was referred to this Court under 28 U.S.C. § 157, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Objection is in the best interests of the Debtors, their estates, their creditors and other parties in interest; and this

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

² Capitalized terms not defined herein shall have the meanings ascribed to the terms in the Objection.

Court having found that the Debtors' notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and that no other notice need be provided; and this Court having reviewed the Objection and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Objection and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Objection is sustained to the extent set forth herein.
2. Each Duplicate Claim on **Exhibit 1** is hereby disallowed and expunged.
3. Each Amended Claim on **Exhibit 2** is hereby disallowed and expunged.
4. The Debtors are authorized to take any action necessary or appropriate to give effect to this Order and the relief granted therein.
5. Kroll Restructuring Administration LLC, the Court-appointed claims and noticing agent in the chapter 11 cases, is hereby authorized and directed to make such revisions to the official claims register as are necessary to reflect the relief granted in this Order.
6. The Debtors' objection to each Duplicate Claim and Amended Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Duplicate Claim and Amended Claim. Any stay of this Order pending appeal by any of the claimants subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.

7. This Order is without prejudice to the rights of the Debtors, their estates, any successors thereto, and any other party in interest, to object to any other proof of claim filed in the chapter 11 cases.

8. The Court shall retain jurisdiction over the claimants whose claims are subject to the Objection with respect to any matter arising from or related to the Objection or this Order, including the interpretation, enforcement and implementation of this Order.

Exhibit 1

Duplicate Claims

Fourth Omnibus Non-Substantive Claims Objection
Ex. 1 - Duplicate Claims

CLAIMS TO BE DISALLOWED

SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	
1	CAOXIAN LUYI GUANGFA ART AND CRAFT. CO, LTD BENNY ZHANG NO 001 QINGHE MIDDLE ROAD CAOXIAN COUNTY HEZE, SD, 27440	01/21/25	25-10068 JOANN Inc.	382	\$81,336.03	CAOXIAN LUYI GUANGFA ART AND CRAFT CO., LTD NO 001 QINGHE MIDDLE ROAD CAOXIAN COUNTY HEZE-SHANDONG-CHI NA, 27440	01/23/25	25-10068 JOANN Inc.	340	\$81,336.03	
Reason: Liabilities asserted on Claim to be disallowed are duplicative of liabilities asserted on remaining Claim.											
2	MILE HIGH HOTELS DBA LAQUINTA BUTTE KEVIN JAMES BUTORI, GENERAL MANAGER 1 HOLIDAY PARK DR. BUTTE, MT 59701	03/31/25	25-10068 JOANN Inc.	10676	\$4,011.04	MILE HIGH HOTELS DBA LAQUINTA BUTTE KEVIN JAMES BUTORI GENERAL MANAGER MILE HIGH HOTELS 1 HOLIDAY PARK DR BUTTE, MT 59701	03/31/25	25-10068 JOANN Inc.	11986	\$4,011.04	
Reason: Liabilities asserted on Claim to be disallowed are duplicative of liabilities asserted on remaining Claim.											
TOTAL					\$85,347.07	TOTAL					\$85,347.07

Exhibit 2

Amended Claims

Fourth Omnibus Non-Substantive Claims Objection
Ex. 2 - Amended ClaimsCLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	AMERICAN FOOD AND VENDING CORPORATION C/O BOND, SCHOENECK & KING, PLLC ATTN: SARA C. TEMES, ESQ. ONE LINCOLN CENTER SYRACUSE, NY 13202	04/04/25	25-10072 Jo-Ann Stores, LLC	10765	\$99,283.42	AMERICAN FOOD AND VENDING CORPORATION C/O BOND, SCHOENECK & KING, PLLC ATTN: SARA C. TEMES, ESQ. ONE LINCOLN CENTER SYRACUSE, NY 13202	04/10/25	25-10072 Jo-Ann Stores, LLC	12750	\$83,448.77
Reason: Amended Claim										
2	ART SUPPLY ENTERPRISES INC. DBA MACPHERSONS 2935 SHAWNEE INDUSTRIAL WAY SUITE 100 SUWANEE, GA 30024-4644	02/03/25	25-10068 JOANN Inc.	296	\$1,117,896.24	ART SUPPLY ENTERPRISES DBA MACPHERSONS 2935 SHAWNEE INDUSTRIAL WAY SUITE 100 SUWANEE, GA 30024-4644	03/25/25	25-10068 JOANN Inc.	7651	\$1,117,896.24
Reason: Amended Claim										
3	CRAFT SMITH, LLC 200 E CHAPMAN AVE ORANGE, CA 92866	01/22/25	25-10068 JOANN Inc.	391	\$247,496.16	CRAFT SMITH LLC 200 E CHAPMAN AVE ORANGE, CA 92866	03/03/25	25-10068 JOANN Inc.	987	\$247,496.16
Reason: Amended Claim										
4	CS INTERNATIONAL (HK) TOYS LIMITED 7TH FLOOR, EDWARD WONG TOWER 910 CHEUNG SHA WAN ROAD KOWLOON, HK,	01/22/25	25-10068 JOANN Inc.	396	\$1,562,564.21	CS INTERNATIONAL (HK) TOYS, LIMITED 7TH FL, EDWARD WONG TOWER 910 CHEUNG SHA WAN ROAD KOWLOON, HK,	02/26/25	25-10068 JOANN Inc.	1422	\$1,558,150.97
Reason: Amended Claim										

Fourth Omnibus Non-Substantive Claims Objection
Ex. 2 - Amended Claims

CLAIMS TO BE DISALLOWED

SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
5	DMC CORPORATION 86 NORTHFIELD AVE EDISON, NJ 08837	03/18/25	25-10068 JOANN Inc.	2204	\$936,200.78	DMC CORPORATION 86 NORTHFIELD AVE EDISON, NJ 08837	03/28/25	25-10068 JOANN Inc.	8842	\$936,200.78
	Reason: Amended Claim									
6	ELEGANT HOME LIMITED JOSEPH LEE UNIT 11, 19F, INTERNATIONAL TRADE CENTRE 11-19 SHA TSUI ROAD, TSUEN WAN HONG KONG,	01/27/25	25-10072 Jo-Ann Stores, LLC	335	\$1,221,210.63	ELEGANT HOME LTD. KEVIN M. CAPUZZI, ESQ. 1313 N. MARKET ST. SUITE 1201 WILMINGTON, DE 19801	04/02/25	25-10072 Jo-Ann Stores, LLC	10445	\$1,221,210.63*
	Reason: Amended Claim									
7	ENCHANTE ACCESSORIES INC. 149 MADISON AVE. FLOOR 12 NEW YORK, NY 10016	03/28/25	25-10072 Jo-Ann Stores, LLC	8485	\$2,394,092.73	ENCHANTE ACCESSORIES INC. 149 MADISON AVE. FL. 12 NEW YORK, NY 10016	04/01/25	25-10072 Jo-Ann Stores, LLC	10326	\$2,394,092.73
	Reason: Amended Claim									
8	EVERBEST (QINGDAO) COMPANY ROOM 709, YUYUAN BUILDING TOWER B NO.75 XIANG GANG XI ROAD QINGDAO,	01/24/25	25-10072 Jo-Ann Stores, LLC	406	\$700,667.30	EVERBEST (QINGDAO) COMPANY 255 W FOOTHILL BLVD AUTE 205 UPLAND, CA 91786	04/03/25	25-10072 Jo-Ann Stores, LLC	10244	\$700,667.30
	Reason: Amended Claim									

Fourth Omnibus Non-Substantive Claims Objection

Ex. 2 - Amended Claims

CLAIMS TO BE DISALLOWED

SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
9	LEISURE ARTS 104 CHAMPS BLVD, SUITE 100 PO BOX 2683 MAUMELLE, AR 72113	03/19/25	25-10072 Jo-Ann Stores, LLC	6474	\$70,428.87	LEISURE ARTS 104 CHAMPS BLVD SUITE 100 MAUMELLE, AR 72113	03/26/25	25-10072 Jo-Ann Stores, LLC	4106	\$70,428.87
	Reason: Amended Claim									
10	MILBERG FACTORS, INC. 99 PARK AVENUE 21 FLOOR NEW YORK, NY 10016	02/27/25	25-10068 JOANN Inc.	1307	\$943,452.13	MILBERG FACTORS, INC. 99 PARK AVENUE 21 FLOOR NEW YORK, NY 10016	04/04/25	25-10068 JOANN Inc.	11978	\$19,286.40
	Reason: Amended Claim									
11	MILBERG FACTORS, INC. 99 PARK AVENUE 21 FLOOR NEW YORK, NY 10016	02/10/25	25-10068 JOANN Inc.	498	\$943,452.13	MILBERG FACTORS, INC. 99 PARK AVENUE 21 FLOOR NEW YORK, NY 10016	02/27/25	25-10068 JOANN Inc.	1307	\$943,452.13
	Reason: Amended Claim									

Fourth Omnibus Non-Substantive Claims Objection
Ex. 2 - Amended Claims

CLAIMS TO BE DISALLOWED

SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
12	NTT INC. DBA FABRIC TRADITIONS 530 7TH AVENUE SUITE305-306 NEW YORK, NY 10018	02/27/25	25-10068 JOANN Inc.	653	\$2,470,570.13	FABRIC TRADITIONS 530 7TH AVENUE 305 NEW YORK, NY 10018 Transferred to: CRG FINANCIAL LLC (AS ASSIGNEE OF NTT INC. DBA FABRIC TRADITIONS) 84 HERBERT AVE BUILDING B SUITE 202 CLOSTER, NJ 07624 FABRIC TRADITIONS 530 7TH AVENUE 305 NEW YORK, NY 10018 Transferred to: CRG FINANCIAL LLC (AS ASSIGNEE OF NTT INC. DBA FABRIC TRADITIONS) 84 HERBERT AVE BUILDING B SUITE 202 CLOSTER, NJ 07624	03/06/25	25-10068 JOANN Inc.	2697	\$1,989,318.62
							03/06/25	25-10068 JOANN Inc.	2697	\$481,251.51

Reason: Amended Claim

Fourth Omnibus Non-Substantive Claims Objection
Ex. 2 - Amended Claims

CLAIMS TO BE DISALLOWED

SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
13	OPTIMUM BUYING LTD HALF OAK HOUSE 28 WATFORD ROAD NORTHWOOD, HA6 3NT	01/24/25	25-10068 JOANN Inc.	6	\$401,952.51	OPTIMUM BUYING LTD. HALF OAK HOUSE 28 WATFORD ROAD NORTHWOOD, HA6 3NT	02/13/25	25-10068 JOANN Inc.	431	\$401,952.51
	Reason: Amended Claim									
14	PAISLEY CRAFTS LLC 5661 E. SHIELDS AVE. FRESNO, CA 93727	01/29/25	25-10068 JOANN Inc.	73	\$588,619.80	PAISLEY CRAFTS, LLC 5661 E SHIELDS AVE FRESNO, CA 93727	03/11/25	25-10068 JOANN Inc.	1646	\$588,619.80
	Reason: Amended Claim									
15	PARAMOUNT HOME COLLECTIONS PVT LTD C/O BANKRUPTCY COLLECTION SERVICES, LLC 84 HERBERT AVE BUILDING B SUITE 202 CLOSTER, NJ 07624	04/04/25	25-10072 Jo-Ann Stores, LLC	11992	\$478,641.62*	PARAMOUNT HOME COLLECTIONS PVT LTD GATE 2A-2B 16TH KM STONE, DELHI ROAD VILLAGE CHOUDHARPUR AMORHA, UTTAR PRADESH, 244222	04/11/25	25-10072 Jo-Ann Stores, LLC	12816	\$478,643.61*
	Reason: Amended Claim									
16	PCT VINYL 5790 COTE DE LIESSE MONTREAL, QC H4T 1B1	01/24/25	25-10072 Jo-Ann Stores, LLC	115	\$242,597.95	PCT VINYL 422 ISABEY STREET MONTREAL, QC, H4T 1V3	04/04/25	25-10072 Jo-Ann Stores, LLC	10785	\$242,597.95
	Reason: Amended Claim									

*Indicates claim contains unliquidated and/or undetermined amounts

Fourth Omnibus Non-Substantive Claims Objection

Ex. 2 - Amended Claims

CLAIMS TO BE DISALLOWED

SURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
17	SHANGHAI ALLTEX TECHNOLOGY CO LTD 3 F NO 12 LANE 688 HENGAN ROAD SHANGHAI, 201112	02/05/25	25-10072 Jo-Ann Stores, LLC	286	\$37,180.61	SHANGHAI ALLTEX TECHNOLOGY CO LTD 3 F NO 12 LANE 688 HENGAN ROAD SHANGHAI,	02/21/25	25-10072 Jo-Ann Stores, LLC	544	\$42,601.94
	Reason: Amended Claim									
18	SHANGHAI LIFETEX INDUSTRY CO LTD NO 17, LANE 688, HENGAN ROAD MINHANG DISTRICT SHANGHAI, 201112	02/10/25	25-10072 Jo-Ann Stores, LLC	299	\$305,938.04	SHANGHAI LIFETEX INDUSTRY CO LTD NO 17, LANE 688, HENGAN ROAD SHANGHAI,	02/21/25	25-10072 Jo-Ann Stores, LLC	543	\$412,156.81
	Reason: Amended Claim									
19	SHENZHEN RIZEE CULTURAL CREATIVITY CO, LTD ZENG JINQING UNIT 1301 RONGCHAO BINHAI BUILDING B HAIXIU ROAD SHENZHEN, CN, 51810	01/23/25	25-10068 JOANN Inc.	179	\$586,853.68	USA DEBT RECOVERY SOLUTIONS, INC. ASSIGNEE OF SHENZHEN RIZEE CULTURAL CREATIVITY CO., LTD 255 W FOOTHILL BLVD SUITE 205 UPLAND, CA 91786	04/02/25	25-10072 Jo-Ann Stores, LLC	11951	\$514,949.80
	Reason: Amended Claim									

Fourth Omnibus Non-Substantive Claims Objection

Ex. 2 - Amended Claims

CLAIMS TO BE DISALLOWEDSURVIVING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	
20	TUFKO INTERNATIONAL KOLLAMKULAM BUILDING# 1/51A, ANAKKAL P.O., KANJIRAPALLY KOTTAYAM, KERALA, 686508	01/31/25	25-10072 Jo-Ann Stores, LLC	87	\$1,092,776.54	TUFKO INTERNATIONAL KOLLAMKULAM BUILDING # 1/51A, ANAKKAL P.O., KANJIRAPALLY KOTTAYAM, KERALA KOTTAYAM, KERALA, 686508	02/28/25	25-10072 Jo-Ann Stores, LLC	666	\$1,466,109.21	
Reason: Amended Claim											
21	VARDHMAN TEXTILES LIMITED CORPORATE LEGAL DEPARTMENT CHANDIGARH ROAD, LUDHIANA LUDHIANA, PUNJAB, 141010	04/04/25	25-10068 JOANN Inc.	10041	\$1,510,406.03	VARDHMAN TEXTILES LIMITED CORPORATE LEGAL DEPARTMENT CHANDIGARH ROAD LUDHIANA, PUNJAB, 141010	04/15/25	25-10068 JOANN Inc.	13479	\$1,510,406.03	
22	VARDHMAN TEXTILES LIMITED CHANDIGARH ROAD LUDHIANA, PUNJAB, 141010	02/22/25	25-10068 JOANN Inc.	562	\$1,094,527.21	VARDHMAN TEXTILES LIMITED CORPORATE LEGAL DEPARTMENT CHANDIGARH ROAD, LUDHIANA LUDHIANA, PUNJAB, 141010	04/04/25	25-10068 JOANN Inc.	10041	\$1,510,406.03	
Reason: Amended Claim											
TOTAL					\$19,046,808.72*	TOTAL					\$18,931,344.80*